

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Tammy Elaine Strickland,

Plaintiff,

vs.

Pilot Travel Centers, LLC, PFJ Southeast,
LLC, FCTI, INC., and ABC Corporation,

Defendants

Case No.:

**NOTICE OF REMOVAL ON BEHALF
OF DEFENDANTS PILOT TRAVEL
CENTERS LLC, AND PFJ SOUTHEAST,
LLC**

Defendants Pilot Travel Centers LLC (incorrectly identified as Pilot Travel Centers, LLC) and PFJ Southeast, LLC., by and through its undersigned attorneys, hereby files its Notice of Removal of this case from the Dillon County Court of Common Pleas. As grounds for this removal, the Defendant states as follows:

1. This Notice of Removal is made pursuant to 28 U.S.C. §§ 1332 and 1446.
2. Plaintiff filed a Summons and Complaint against the Defendant in the Dillon County Court of Common Pleas (Civil Action No. 2022CP1700541). The Defendant was served with a copy of the aforementioned Summons and Complaint on or about December 2, 2022. Copies of the aforementioned documents have been attached hereto as **Exhibit 1**. To the Defendant's knowledge, no other state filings exist, and no hearings are pending in Civil Action No. 2022CP1700541.
3. This action is a civil action and involves a controversy wholly between citizens of different states.
4. The Defendant is a limited liability company organized and existing under the laws of the State of Delaware, with its principal place of business located in Knoxville, Tennessee. No member of Defendant is a citizen of South Carolina. Defendant is composed of four members: (a) National Indemnity Company; (b) Pilot Corporation; (c) BDT I-A Plum Corporation; and (d) FJM

Investments, LLC. National Indemnity Company is a corporation incorporated under the state laws of Nebraska. Its principal place of business is 1314 Douglas Street Suite 1400, Omaha Nebraska ,68102-1944. Pilot Corporation is a corporation organized under the state laws of Tennessee. Its principal place of business is located at 5508 Lonas Road, Knoxville, TN, 37909. BDT I-A Plum Corporation is corporation incorporated under the state laws of Delaware. Its principal place of business is located at 401 N Michigan Ave, Chicago, IL 60611. FJM Investments LLC is a limited liability company organized under the state laws of Utah. Its principal place of business is located at 185 S. State St., Ste 1300, Salt Lake City, UT 84111. FJM Investments LLC is composed of one member, FJ Management Inc. FJ Management Inc. is organized under the state laws of Utah and shares the same principal address as FJM Investments LLC.

5. Defendant PFJ Southeast, LLC was merged into Pilot Travel Centers LLC on or about December 1, 2021 and does not exist anymore.

6. According to Plaintiff's Complaint, Plaintiff is a citizen of South Carolina.

7. The value of the matter in dispute in this case, upon the Defendant's good faith belief and information, exceeds the sum of \$75,000, exclusive of interest and costs. This belief is based upon Defendant's understanding that Plaintiff is alleging injury including concussion, headache, and neck pain.

8. The Clerk of the Court of Common Pleas for Dillon County, South Carolina will be provided a copy of this Notice of Removal.

WHEREFORE, the Defendant hereby gives Notice of Removal of the action now pending in the Dillon County Court of Common Pleas to the United States District Court for the District of South Carolina, Florence Division.

SIGNATURE PAGE TO FOLLOW

HOWSER, NEWMAN & BESLEY, LLC

BY: /s/ Albert R. Pierce, Jr.
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***Attorneys for Defendants Pilot Travel Centers
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December 22, 2022
Columbia, SC